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VIA ECF

Honorable Judge Louis L. Stanton
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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Re: **Gonzalez v. 71 Fifth Ground Lessor, et al. (1:18-CV-08122-LSS) (LSD)**
Morales v. 71 Fifth Ground Lessor, et al. (1:18-CV-08040-LSS) (LSD)

Dear Honorable Judge Stanton:

The undersigned represents **Craven Management Corporation** ("Craven") in the above matters. Craven is a defendant/fourth third-party defendant in the *Gonzalez* matter, and a fourth third-party defendant only in the *Morales* matter. For the purposes of brevity, the undersigned adopts the recitation provided by counsel for defendant/fourth third-party plaintiff **MC 71 Fifth Avenue** in his letters filed earlier today.

Counsel for **Otek Builders LLC** ("Otek"), **WeWork Companies, Inc.**, ("WeWork") and **71 5th Avenue Tenant, LLC** ("71 5th Ave.") has consented to extend Craven's time to oppose their Motion for Summary Judgment until April 28, 2023. Counsel for **LSL Construction Services, Inc.** ("LSL") has also consented to extend Craven's time to oppose its motion until April 28, 2023. This additional time was requested due to the complex nature of the coverage issues and multiple contractual relationships that must be addressed in the anticipated oppositions.

Based upon the above, the undersigned respectfully requests that this Court permit Craven to submit its affirmations in opposition to the above referenced motions filed by Otek/WeWork/71 5th Ave. and LSL until April 28, 2023.

Respectfully,

Stefan A. Borovina

SG
Ordered
Louis L
Stanton
4/18/23

cc: **ALL PARTIES VIA ECF**

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